

[SUBMITTING COUNSEL ON SIGNATURE  
PAGE]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JOHN NYPL, et al.,

Plaintiffs,

v.

JPMORGAN CHASE & CO., et al.,

Defendants.

Case No. 3:15-cv-02290-VC

**STIPULATION AND [PROPOSED]  
ORDER REGARDING BRIEFING  
SCHEDULE ON DEFENDANTS' MOTION  
TO TRANSFER UNDER 28 U.S.C. § 1404  
AND CONTINUANCE OF CASE  
MANAGEMENT CONFERENCE  
[CURRENTLY SCHEDULED FOR  
OCTOBER 27]**

1 WHEREAS Plaintiffs John Nypl, Lisa McCarthy, MAD Travel, Inc. a.k.a. Travel Leaders,  
2 Valarie Jolly, Go Everywhere, Inc., William Rubinsohn d.b.a. Rubinsohn Travel (collectively,  
3 “Plaintiffs”), and Defendants J.P. Morgan Chase & Co., J.P. Morgan Chase N.A., Bank of America  
4 NA, HSBC Finance Corporation, HSBC Bank USA, HSBC North America Holdings, Inc., HSBC  
5 Holdings plc, Citigroup, Inc., UBS AG, Barclays PLC, Royal Bank of Scotland\* (collectively,  
6 “Defendants”), have agreed, at the Court’s direction, to continue the hearing date on Defendants’  
7 Motion to Transfer Under 28 U.S.C. § 1404 (“Transfer Motion”) to November 12, 2015, at  
8 10:00 a.m.;

9 WHEREAS, the parties believe it will conserve judicial and party resources for the Transfer  
10 Motion to be heard before the Case Management Conference currently scheduled for October 27,  
11 2015;

12 THEREFORE, THE PARTIES, BY AND THROUGH THEIR RESPECTIVE  
13 UNDERSIGNED COUNSEL, HEREBY STIPULATE, AND THE COURT ORDERS AS  
14 FOLLOWS:

15 1. Plaintiffs shall file and serve their opposition to the Transfer Motion on or before  
16 October 14, 2015;

17 2. Defendants shall file and serve their reply on the Transfer Motion on or before  
18 October 28, 2015;

19 3. The date of the Case Management Conference shall be continued to  
20 December 1, 2015, at 10:00 a.m.

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26 \* The First Amended Complaint names as a Defendant “Royal Bank of Scotland,” which is not an  
27 accurate corporate name. For present purposes only, The Royal Bank of Scotland plc joins this  
28 stipulation reserving all rights, including as to personal jurisdiction, subject to clarification and  
revision if the case proceeds.

1  
2 DATED: September 17, 2015

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10 DATED: September 17, 2015

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*Attorneys for Defendant Barclays Bank PLC*

1 DATED: September 17, 2015

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12 ***Attorneys for Plaintiffs John Nypl, Lisa McCarthy, MAD Travel, Inc. a.k.a. Travel Leaders, Valarie Jolly, Go Everywhere, Inc., William Rubinsohn d.b.a. Rubinsohn Travel***

13 DATED: September 17, 2015

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21 ***Attorney for Plaintiffs John Nypl, Lisa McCarthy, MAD Travel, Inc. a.k.a. Travel Leaders, Valarie Jolly, Go Everywhere, Inc., William Rubinsohn d.b.a. Rubinsohn Travel***

22 **ATTESTATION PURSUANT TO LOCAL CIVIL RULE 5-1**

23 Pursuant to Local Civil Rule 5-1 of the Northern District of California, I attest that  
24 concurrence in the filing of the document has been obtained from each of the other signatories to this  
25 document.

26 /s/ Joel S. Sanders  
27 Joel S. Sanders  
28

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE VINCE CHHABRIA  
UNITED STATES DISTRICT JUDGE



### DECLARATION OF SERVICE

I, Joel S. Sanders, declare as follows:

I am employed in the County of San Francisco, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 555 Mission Street, Suite 3000, San Francisco, California, 94105, in said County and State. On the date below, I served the within:

**STIPULATION AND [PROPOSED] ORDER REGARDING BRIEFING  
SCHEDULE ON DEFENDANTS' MOTION TO TRANSFER UNDER 28 U.S.C.  
§ 1404 AND CONTINUANCE OF CASE MANAGEMENT CONFERENCE  
[CURRENTLY SCHEDULED FOR OCTOBER 27]**

to all named counsel of record as follows:



**BY ECF (ELECTRONIC CASE FILING):** I e-filed the above-detailed documents utilizing the United States District Court, Northern District of California's mandated ECF (Electronic Case Filing) service on September 17, 2015. Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the documents upon confirmation of e-filing.

I certify under penalty of perjury that the foregoing is true and correct, that the foregoing document(s) were printed on recycled paper, and that this Declaration of Service was executed by me on September 17, 2015, at San Francisco, California.

/s/ Joel S. Sanders

Joel S. Sanders